

-and-

*Attorneys for Defendant
MLS National Medical Evaluations, Inc.*

MICHAEL CACOPERDO,

Plaintiff,

- against -

**HARTFORD LIFE INSURANCE COMPANY;
MLS National Medical Evaluations, Inc. and
Medical Evaluation Specialists, Inc. d/b/a MES
Solutions**

Defendants.

10 CV 7847 (RPP)

ECF Case

MOTION TO ADMIT
COUNSEL *PRO HAC VICE*

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts
for the Southern and Eastern Districts of New York, I, Joseph A. Vogel, as sponsor, a member
in good standing of the bar of this Court, hereby move for an Order allowing the admission
pro hac vice of

FILED
U.S. DISTRICT COURT
2011 MAY 10 PM 3:05
S.D. OF N.Y.

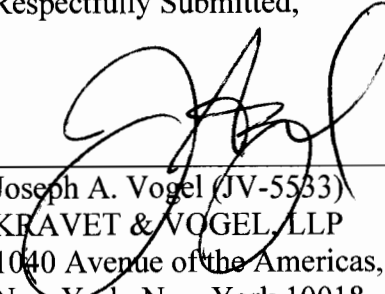
Applicant's Name: Avery K. Williams
Firm Name: Williams Acosta, PLLC
Address: 535 Griswold, Suite 1000
City/State/Zip: Detroit, Michigan 48226
Phone Number: (313) 963-3873
Fax Number: (313) 961-6879

Avery K. Williams is a member in good standing of the Bar of the State of Michigan
(Mich. State Bar No. P34731).

There are no pending disciplinary proceedings against Avery K. Williams in any State
or Federal court.

Dated: May 10, 2011
New York, New York

Respectfully Submitted,



Joseph A. Vogel (JV-5533)
KRAVET & VOGEL, LLP
1040 Avenue of the Americas, Suite 1101
New York, New York 10018
Tel.: 212-997-7634
Fax: 212-997-7686

Attorneys for Defendant
MLS National Medical Evaluations, Inc.

Avery K. Williams (Mich. State Bar No. P34731,
Pro Hac Vice Admission Being Requested)
WILLIAMS ACOSTA, PLLC
535 Griswold Street, Suite 1000
Detroit, Michigan 48226-3692
(313) 963-3873
Email: awilliams@williamsacosta.com

-and-

Joseph A. Vogel (JV-5533)
KRAVET & VOGEL, LLP
1040 Avenue of the Americas, Suite 1101
New York, New York 10018-3703
(212) 997-7634
Email: jvogel@kvnyc.com

Attorneys for Defendant
MLS National Medical Evaluations, Inc.

**IN THE UNITED STATE DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MICHAEL CACOPERDO,)	10 CV 7847 (RPP)
)	
Plaintiff,)	ECF Case
)	
- against -)	
)	
HARTFORD LIFE INSURANCE COMPANY;)	
MLS National Medical Evaluations, Inc. and)	<u>AFFIDAVIT OF JOSEPH A.</u>
Medical Evaluation Specialists, Inc. d/b/a MES)	<u>VOGEL IN SUPPORT</u>
Solutions)	<u>OF MOTION TO ADMIT</u>
)	<u>COUNSEL PRO HAC VICE</u>
Defendants.)	
)	

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

JOSEPH A. VOGEL, being duly sworn, hereby deposes and says as follows:

1. I am a member of the firm of Kravet & Vogel, LLP, attorneys for Defendant MLS

National Medical Evaluations, Inc. ("Defendant MLS"), together with the firm of Williams Acosta, PLLC, in the above captioned action. I am familiar with the proceedings in this case and have reviewed the amended complaint filed herein. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant MLS's motion to admit Avery K. Williams, Esq. of the firm Williams Acosta, PLLC, as counsel *pro hac vice* to represent Defendant MLS in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in March 24, 1982. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have come to know Avery K. Williams through Jonathan Wolfert, Esq. of the firm Seyfarth Shaw, LLP in New York, by way of Gregory Jenkins, a former member of this bar who has known Avery K. Williams since 1979.

4. Mr. Williams is a co-managing partner of Williams Acosta, PLLC, in Detroit, Michigan. Mr. Williams was admitted to practice before the Courts of Michigan on December 6, 1982 and has remained in good standing since then. A copy of a Certificate of Good Standing for Mr. Williams, issued by the Michigan Supreme Court within 30 days, is annexed hereto as Exhibit A.

5. I am informed and have come to know that Mr. Williams is a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

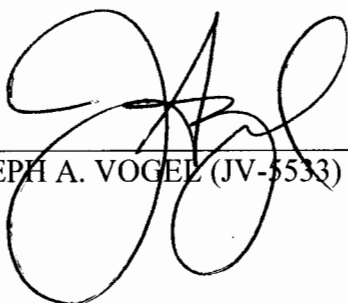
6. Accordingly, I am pleased to move the admission of Avery K. Williams, *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of Avery K. Williams, *pro hac vice*, which is attached hereto as Exhibit B.

WHEREFORE it is respectfully requested that the motion to admit Avery K. Williams, *pro hac vice*, to represent Defendant MLS National Medical Evaluations, Inc., together with the undersigned, in the above-captioned matter, be granted.

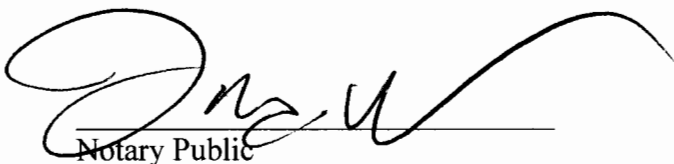
Dated: May 10, 2011
New York, New York

Respectfully submitted,



JOSEPH A. VOGEL (JV-5533)

Subscribed and sworn to before me
this 10th day of May 2011.



Notary Public

DONALD J. KRAVET
Notary Public, State of New York
No. 49-4845645
Qualified in Westchester County
Commission Expires April 30, 2014

THE SUPREME COURT of the STATE OF MICHIGAN

I, Corbin R. Davis, Clerk of the Michigan Supreme Court and Custodian of the Roll of Attorneys admitted to the practice of law in this state, do hereby certify that, as appears from the records,

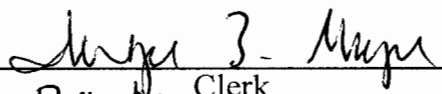
Avery K. Williams

was admitted to the practice of law in the courts of the State of Michigan on

December 6, 1982

and has remained in good standing since then.

In Testimony Whereof, I set my hand and
affix the seal of the Michigan Supreme
Court on this date: May 06, 2011



Clerk

is admitted to practice *pro hac vice* as counsel for Defendant MLS National Medical Evaluations, Inc. in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an

ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: _____
New York, New York

United States District/Magistrate Judge

CERTIFICATION OF SERVICE

I, Joseph A. Vogel, certify that I am an attorney in good standing licensed by the State Bar of New York and admitted to practice in this Court, and that on May 10, 2011, I caused true copies of the annexed: (i) Motion to Admit Counsel Pro Hac Vice; and (ii) Affidavit of Joseph A. Vogel in Support of Motion to Admit Counsel Pro Hac Vice with Exhibits A & B annexed thereto, to be served by first class mail addressed to counsel for the parties herein as follows:

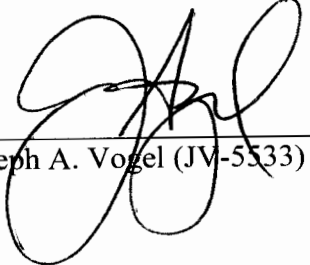
Jason A. Newfield, Esq.
FRANKEL & NEWFIELD, P.C.
585 Stewart Avenue, Suite 301
Garden City, New York 11530
Tel. 516-222-1600
Email: jan@frankelnewfield.com
Attorneys for the Plaintiff Michael Cacoperdo

Michael H. Bernstein, Esq.
SEDGWICK LLP
125 Broad Street, 39th Floor
New York, New York 10004
Tel. 212-422-0202
Email: michael.bernstein@sdma.com
Attorneys for Defendant Hartford Life Insurance Company

Andrew I. Hamelsky, Esq.
WHITE AND WILLIAMS, LLP
One Penn Plaza
250 West 34th Street, Suite 4110
New York, New York 10119
Tel. 212-631-4406
Email: hamelskya@whiteandwilliams.com
Attorneys for Medical Evaluation Specialists, Inc.

I certify under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Dated: New York, New York
May 10, 2011



Joseph A. Vogel (JV-5533)